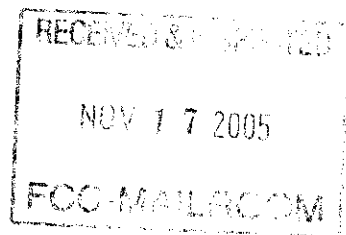


In The Matter Of: FCC Docket No. RM-11287  
Creation Of A Low Power AM Radio Service

WRITTEN COMMENTS OF  
THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN  
AND  
XXX OTHER PARTIES



THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN (MMWC) is a citizens' advocacy group for public airwaves which are more open to airing local artists and performers -- as well as more focused on community

coverage in On Air news and features. As one crucial step toward this goal, MMWC is one of 5 signatories of the August 19, 2005 Petition For Rulemaking to establish a Low Power AM (LPAM) Radio Service. While MMWC focuses on the Great Lakes Region, we are also the affiliate of another Petitioner, THE AMHERST ALLIANCE, which has a national membership. MMWC, acting in concert with the other parties to these Written Comments, fervently applauds the Commission's October 23 decision to open Docket RM-11287 and solicit public comments on the August 19 LPAM Petition. We urge the Commission to move to the proposed rule stage of these proceedings, and then to the final rule stage of these proceedings, as expeditiously as it reasonably can. Expeditious action to establish a Low Power AM Radio Service is needed for at least three compelling reasons:

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(1) In some (largely urban) areas where the FM Band is completely congested, Low Power Radio on the AM Band is the only way that any Low Power Radio stations can be licensed at all. Metropolitan Detroit is one of those areas.

A December 2003 study by REC NETWORKS, which was submitted to the Commission in FCC Docket RM-10803, revealed that even Congressional legislation to repeal the current adjacent channel spacing restrictions would not open any new LP100 frequencies on the FM Band.

REC NETWORKS found that Commission action on the long-promised "filing window" for LP10 licenses might open one frequency for a local Low Power Radio station on the FM Band.

By contrast, three to four frequencies could be opened on the AM Band. Metropolitan Boston, and other large metropolitan areas, are in the same position.

In these areas, only Low Power AM can establish any presence for Low Power Radio stations on the local radio dial. Other urban areas -- such as Metropolitan Providence -- have only a single LP100 frequency available. Without Low Power AM stations, ideally supplemented by LP10 stations on the FM Band, Low Power Radio will have only a nominal presence.

(2) Outside of the areas with a highly congested FM Band, Low Power Radio stations may be available on the FM Band.

However, the programming choices offered by those Low Power Radio stations are more limited than they have to be.

In accordance with the Commission's own regulations, issued in 2000, Low Power FM licenses are directed toward non-profit organizations with an established record of community service.

Unless the fundamental tenets of the Low Power FM Radio Service are re-opened for re-examination, Low Power AM is the only way that Low Power Radio licenses can be made available to individuals and newcomer organizations.

(3) Since the Commission has chosen to reserve 100% of all Low Power FM licenses for non-commercial broadcasting, Low Power AM is also the only way that any Low Power Radio stations, in any location, will ever be able to air commercials.

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The undersigned parties are aware, of course, that reasonable people can honorably disagree over some details of the August 19 LPAM Petition. Nevertheless, the Commission is free to modify any details of the LPAM

Petition, or even to draft its own proposal "from scratch", during the proposed rule stage of these proceedings -- and, again, during its deliberations on drafting a final rule.

For now, the most important question is whether the idea of a Low Power AM Radio Service is worth pursuing.

To this question, the undersigned parties answer with a resounding "YES!"

All of us urge the Federal Communications Commission to keep the process moving toward a proposed rule -- and then a final rule.

There is plenty of time to debate the details as the regulatory process unfolds, but we will never have those debates unless the FCC keeps the process moving toward its own proposed and final rules.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be "JP" or "JPB".

JOHN PRESCOTT

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